

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

FILED

OCT 15 2018

CARTER PAGE,

Plaintiff,

-v-

DEMOCRATIC NATIONAL
COMMITTEE; PERKINS COIE LLP;
MARC ELIAS; AND MICHAEL
SUSSMANN,

Defendants.

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY , DEPUTY

Civil Action No.:

**PLAINTIFF CARTER PAGE'S
LCvR3.7 NOTICE OF RELATED
CASE**

Pursuant to LCvR3.7, the undersigned pro se Plaintiff certifies that I currently have a partially related case filed in the United States Court of Appeals for the Second Circuit (2d Cir.) involving some common issues of fact: Carter Page v. Oath Inc. and Broadcasting Board of Governors. The panel for this case has not yet been assigned, and the case number is 18-cv-2295.

The 2d Cir. case is an appeal of a preceding civil action by the same name that was filed in the U.S. District Court for the Southern District of New York ("S.D.N.Y.") on September 14, 2017 (17-cv-6990). At the time of that initial Complaint, the involvement of the Defendants in the current civil action in some related activities involving the U.S. Government and some media organizations had not been publicly disclosed and was only partially revealed on or about October 24, 2017.¹

¹ Adam Entous, Devlin Barrett, and Rosalind S. Helderman, "Clinton campaign, DNC paid for research that led to Russia dossier," *Washington Post*, October 25, 2017. p. A1.
https://www.washingtonpost.com/world/national-security/clinton-campaign-dnc-paid-for-research-that-led-to-russia-dossier/2017/10/24/226fabf0-b8e4-11e7-a908-a3470754bbb9_story.html

As briefly explained in my Complaint today, the intentional misinformation campaign that the Defendants funded and managed has unleashed a torrent of terrorist threats and other damages against me. Many of these threats have been experienced in New York or Washington, where a greater proportion of people have accepted the false rumors that the Defendant's opposition research activities created. My decision to pursue this civil action in the W.D. Okla. primarily stems from related security considerations and is part of the extraordinary efforts I have had to continue taking to remain safe.

Given subsequent death threats stemming from the slanderous and libelous information alleged by the Defendants, the outcome of their defamation clearly displays the requisite elements of the statutory definition of domestic terrorism: "activities that involve acts dangerous to human life that are a violation of the criminal laws of the United States or of any State" and "appear to be intended...to intimidate or coerce a civilian population... to influence the policy of a government by intimidation or coercion; or... to affect the conduct of a government by... assassination... and... occur primarily within the territorial jurisdiction of the United States." See 18 U.S.C. § 2331(5).

As a related example which helps to further illustrate the persistent nature of these domestic terrorist threats, I was again confronted in New York by an adversarial member of the public who had apparently been convinced by the false information that consultants of the Defendants spread to the media (the "Foley Square Incident"). On the way to S.D.N.Y.'s ECF Training at the Daniel Patrick Moynihan Courthouse on the afternoon of February 15, 2018, I briefly greeted a lawyer I know who was at the bottom of the stairs in front of the Thurgood Marshall Courthouse. The lawyer said to a

colleague whom he was walking with: "Let me introduce you to Carter Page". As that identification process occurred, I noticed that an onlooker in Foley Square walked closer and lurked nearby. The same gawker subsequently followed me towards the quieter confines of Pearl Street. When I was in a somewhat less secure area with fewer people nearby, the bystander hollered at me with a spiteful tone: "I hope they get you!"

Although the gawker did not stipulate his specific meaning, this "get you" intimidation may potentially relate to two possible alternatives: (A) a potential indictment stemming from the Defendant-sponsored Witch Hunt helped initiate in substantial part through their multimillion-dollar Dodgy Dossier opposition research campaign in 2016, and/or (B) further steps forward in the extrajudicial domestic terror campaign that the Defendants' defamatory misinformation from the Dodgy Dossier, upon which it is based, has played an essential role in inspiring. Whereas no indication has ever been expressed that there may be any legitimate basis for genuine legal process that may lead to alternative (A), *supra*, now that the false evidence presented in the Dodgy Dossier has been significantly debunked, one must assume that the most relevant intention relates to the far more ominous alternative (B).

Dated: October 15, 2018

Very respectfully,

By: /s/ Carter Page
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